

May 12, 2014

Honorable Keith P. Ellison
United States District Judge
Southern District of Texas
Bob Casey Federal Courthouse
515 Rusk Avenue, Room 3716
Houston, Texas 77002

Re: *In re BP p.l.c. Securities Litigation*, 4:10-MD-02185

Dear Judge Ellison:

We write jointly to inform the Court of a schedule, to which the parties have agreed, for the remainder of expert discovery and the filing of summary judgment and *Daubert* motions that will be keyed to the trial date the Court selects. If the Court agrees, the parties jointly propose the following revisions to the remaining schedule:

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Defendants to serve expert reports responsive to the Report of Chad Coffman	May 12	May 16
Close of Expert Discovery	June 19	180 days before trial
Dispositive and non-dispositive motions, including <i>Daubert</i> motions (but not motions <i>in limine</i>)	N/A	165 days before trial
Oppositions to dispositive and non-dispositive motions	N/A	120 days before trial
Replies on dispositive and non-dispositive motions	N/A	90 days before trial

Honorable Keith P. Ellison

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We are, of course, available to discuss this subject if the Court wishes.

Respectfully Submitted,



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cc: All Counsel